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Sent: Friday, February 03, 2012 1:42 PM
To: Moore, Bill (ECY); Beale, Harriet (ECY)
Cc: Bill Taylor
Subject: SWMMWW comments

Hi Bill and Harriet.

As you know today is the deadline for comments on the 2012 Draft Stormwater Management Manual for Western Washington. Conspicuously absent from the inbox will be comments from the Pacific Coast Shellfish Growers Association. We had a significant group of growers engaged on the issue and a comment letter drafted however we could not arrive at agreement on a position.

I wanted to at least touch base so you are aware we are tracking Ecology's stormwater efforts. Despite our silence, stormwater remains a critical issue for shellfish growers. We appreciate the good work you are doing to try to move the bar particularly as it relates to LID.

We're challenged on this issue because we need clean water but we're businesses that also understand the consequences of burdensome regulations particularly during these difficult economic times. As you can imagine, opinions among shellfish growers were all over the board.

From Taylor Shellfish, our perspective is that we need to be moving more and more towards LID practices. Technology and knowledge is evolving rapidly in this arena. It is not appropriate everywhere but where it is and to the extent we can incentivize the adoption of the practices rather than mandate them we think that is appropriate. Adjacent to sensitive areas (such as shellfish growing areas) similar to what we have done with O&M requirements on septic systems, we may need to consider more stringent stormwater regulations or requiring LID.

Looks like we have a non-stormwater weekend coming up. I hope you both enjoy it!

Best regards,

Bill Dewey



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